

Jim Morrison
State Bar No. 14519050
ALLMAND LAW FIRM, P.L.L.C.
860 Airport Freeway, Suite 401
Hurst, TX 76054
214.265.0123 Phone
214.265.1979 Fax
ATTORNEY FOR DEBTOR

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	
	§	CASE NO. 13-30466
ERVIN FRANK LAYER	§	
	§	CHAPTER 13
Debtor(s)	§	
CHASE HOME MORTGAGE CORP.	§	
Respondent	§	
	§	
VS.	§	
	§	
ERVIN FRANK LAYER	§	Hearing Date: 11/3/2016
	§	
Debtor(s)	§	Hearing Time: 8:30 a.m.

**DEBTOR'S REPLY TO RESPONSE TO NOTICE OF AMOUNT DEEMED
NECESSARY TO CURE MORTGAGE ARREARS**

TO THE HONORABLE JUDGE OF THIS COURT:

COMES NOW **ERVIN FRANK LAYER**, Debtor in the above-styled and numbered cause, and in response to the Trustee's Notice of Amount Deemed Necessary to Cure Mortgage Arrears ("the Notice") and the Response to the Trustee's Notice of Amount Deemed Necessary to Cure Mortgage Arrears ("the Response") of **Bayview Loan Servicing, LLC**, ("Respondent") in regard to the collateral referenced in Trustee's Notice. Debtor respectfully shows the Court as follows:

1. Debtor admits the allegations in the Trustee's Notice regarding the treatment of the pre-petition mortgage arrears.

2. Debtor admits the allegations of **Respondent** contained in paragraphs 1 of the Response.

3. Debtor neither admits nor denies the allegations of **Respondent** contained in paragraphs 2 of the Response because Debtor is without sufficient knowledge or information to form a belief as to the truth and therefore makes a qualified denial.

WHEREFORE, PREMISES CONSIDERED, Debtor respectfully prays that an Order be entered consistent with the foregoing Response/ Reply and for such other and further relief as the Court may deem just and appropriate.

Dated: October 20, 2016.

Respectfully Submitted,

ALLMAND LAW FIRM, P.L.L.C.

/s/ Jim Morrison

Jim Morrison

State Bar No. 14519050

ALLMAND LAW FIRM, P.L.L.C.

860 Airport Freeway, Suite 401

Hurst, TX 76054

214.265.0123 Phone

214.265.1979 Fax

ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 20, 2016, a true and correct copy of the foregoing Response to Trustee's Notice to Deem Current was served on the following parties in interest by first class mail or electronic notice:

CHAPTER 13 TRUSTEE

Thomas Powers
125 E. John Carpenter Frwy., Suite 1100
Irving, TX 75062-2288

U.S. TRUSTEE

1100 Commerce Street
Room 976
Dallas, TX 75242

DEBTOR

Ervin Frank Layer
9814 Faircrest Drive
Dallas, TX 75238

OPPOSING COUNSEL

Thomas Frederick Jones, III
Codilis & Stawiarski
650 North Sam Houston Parkway East
Suite 450
Houston, TX 77060

By: /s/ Jim Morrison
Jim Morrison
State Bar No. 14519050